IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NORTH DAKOTA

UNITED STATES OF AMERICA	INDICTMENT
v.	Case No.

AMBER LYNN HOWE and LORRAINE KAY HOWE

Violations: 18 U.S.C. § 1153; and N.D.C.C. §§ 14-09-22 and 12.1-32-01

COUNT ONE

Child Abuse in Indian Country

The Grand Jury Charges:

From in or about August 2018 to in or about September 2022, in the District of North Dakota, in Indian country, and within the exclusive jurisdiction of the United States,

AMBER LYNN HOWE,

an Indian, was the parent, guardian, custodian, and adult family and household member of J.I. (DOB 2015), a female child, and she willfully inflicted bodily injury upon J.I. by repeatedly striking the child;

COUNT TWO

Child Abuse in Indian Country

The Grand Jury Further Charges:

From in or about August 2020 to in or about September 2022, in the District of North Dakota, in Indian country, and within the exclusive jurisdiction of the United States,

LORRAINE KAY HOWE,

an Indian, was the parent, guardian, custodian, and adult family and household member of A.I. (DOB 2014), a female child, and she willfully inflicted bodily injury upon A.I. by striking the child with a shoe, stick, and hammer;

COUNT THREE

Child Abuse in Indian Country

The Grand Jury Further Charges:

From in or about January 2020 to in or about December 2020, in the District of North Dakota, in Indian country, and within the exclusive jurisdiction of the United States,

AMBER LYNN HOWE,

an Indian, was the parent, guardian, custodian, and adult family and household member of T.M. (DOB 2006), a male child, and she willfully inflicted bodily injury upon T.M. by striking the child with a board;

COUNT FOUR

Child Abuse in Indian Country

The Grand Jury Further Charges:

From in or about June 2021 through in or about September 2021, in the District of North Dakota, in Indian country, and within the exclusive jurisdiction of the United States,

LORRAINE KAY HOWE,

an Indian, was the parent, guardian, custodian, and adult family and household member of M.M. (DOB 2007) a female child, and she willfully inflicted bodily injury upon M.M. by physically assaulting her and hitting her multiple times with an aerosol can;

COUNT FIVE

Child Abuse in Indian Country

The Grand Jury Further Charges:

From in or about August 2018 to in or about September 2022, in the District of North Dakota, in Indian country, and within the exclusive jurisdiction of the United States,

AMBER LYNN HOWE,

an Indian, was the parent, guardian, custodian, and adult family and household member of J.I. (DOB 2015), a female child, and she willfully inflicted bodily injury upon J.I. by repeatedly strangulating the child;

In violation of Title 18, United States Code, Section 1153, and North Dakota Century Code, Sections 14-09-22 and 12.1-32-01.

A TRUE BILL:

/s/ Foreperson
Foreperson

/s/ Mac Schneider
MAC SCHNEIDER

United States Attorney

GLD/tmg